STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

CENTRAL ILLINOIS LIGHT COMPANY)
D/B/A Ameren/CILCO) No. 05-0160
Proposal to implement a competitive procurement)
Process by establishing Rider BGS, Rider BGS-L,)
Rider RTP, Rider RTP-L, Rider D, and Rider MV)
CENTRAL ILLIONOIS PUBLIC SERVICE COMPANY)
d/b/a AmerenCIPS)
) No. 05-0161
Proposal to implement a competitive procurement)
Process by establishing Rider BGS, Rider BGS-L,)
Rider RTP, Rider RTP-L, Rider D, and Rider MV)
ILLINOIS POWER COMPANY)
d/b/a AmerenIP)
) No. 05-0162
Proposal to implement a competitive procurement)
Process by establishing Rider BGS, Rider BGS-L,)
Rider RTP, Rider RTP-L, Rider D, and Rider MV)

PEOPLE'S MOTION TO FILE A LATE-FILED EXHIBITS

The People of the State of Illinois by Attorney General Lisa Madigan, request that the Commission accept the attached three documents as late filed exhibits in this docket.

In support of this motion, the People state as follows:

- Section 200.875(c) authorizes the Commission to accept exhibits into the record after the record has been marked "heard and taken" as late-filed exhibits, for good cause shown. 83 Ill. Adm. Code 200.875(c).
- On January 9, 2006, during oral argument before the Commission,
 Commissioner Lieberman stated that he wanted to see the data request
 responses referenced in AG Ex. 2.0 discussing risk premiums.

- 3. The data request responses referred to in AG Ex. 2.0, at pages 8-9 are:

 Ameren's responses to AG 2.1, 2.2, 2.9 and 2.10. The questions and answers are attached to this Motion as AG Supp. Ex. 2.1, 2.2, 2.9 and 2.10.
- 4. All parties were notified which data requests are being offered into the record with this motion. Ameren informed the People that it has no objection to the submission of these documents as late filed exhibits. No party has communicated an objection.

Wherefore, the People request that the Commission find good cause, and accept AG Supp. Ex. 2.1, 2.2, 2.9 and 2.10 as late filed exhibits.

Respectfully submitted,

People of the State of Illinois

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